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J o n e s
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June 18, 2019
Judge Sterling Johnson, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Hammock v. Moving State to State, LLC et al.*,
No. 1:18-cv-05628-SJ-ST: Status Report

By Status Report Order dated June 14, 2019, the Court has directed us, counsel for the Plaintiff Corey Hammock, to file a brief status report with the Court by June 18, 2019. As requested, we are providing this general update to the Court. As detailed below, in light of recent developments and in the interest of conserving judicial resources, we request an adjournment of the status conference currently scheduled for June 20, 2019.

Since Magistrate Judge Tiscione entered an Order granting Plaintiff's Motion for Discovery on May 10, 2019, we issued subpoenas to Prime Group Holdings, LLC. These included subpoenas for information/documents as well as for inspection of premises at the storage units where our client's belongings are believed to be held. Prime Group Holdings, LLC, accepted service of the subpoenas and amicably coordinated with us to allow inspection of the storage units, which was undertaken on June 13. Our client reviewed photographs and videos taken of the contents of the storage units in question; he was able to confirm that the storage units contained at least some of his belongings. We are still awaiting Prime Group Holdings' responses to our subpoenas for additional information and documents.

We also learned that Defendant Moving State to State and its principals have been the subject of an FBI investigation. We have cooperated with the FBI after receiving an inquiry from them. The investigation culminated in a civil action

in this Court before the Hon. Judge Brodie. *See* Civil Action No. 1:19-cv-01578-MKB-CLP, *United States v. Yarin Nadel et al.* In that action, the Court issued a Preliminary Injunction, upon consent of the parties, temporarily restraining the Defendants from “removing personal property originally received from customers for moving, and now stored on the premises of a third-party, from the third-party premises without prior permission and approval from the Court.” Dkt. No. 17. The Defendants have participated in that action and recently consented to returning some of their customers’ goods.

We are now coordinating with the FBI and the Assistant U.S. Attorney handling this matter to avoid any inconsistent injunctions and in a joint effort to have our client’s belongings returned to him. Once our client’s belongings have been returned and inventoried, we will be better able to prepare for a damages inquest. With this in mind, we respectfully request that the Court adjourn this status conference for approximately six weeks, to such time as suits the Court in early August. If our client’s belongings have been returned by that date, we intend to request that the Court schedule a damages inquest thereafter.

Dated: June 18, 2019

Respectfully Submitted,



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